

EXHIBIT C

From: David Johnson <David.Johnson@butlersnow.com>

Date: August 1, 2017 at 5:26:48 PM CDT

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Cc: Andrew Tharp <Andrew.Tharp@butlersnow.com>, Jim Barton <Jim.Barton@butlersnow.com>, Meta Danzey <meta.danzey@butlersnow.com>

Subject: Monnica Reyes v. Ethicon, Inc.

Counsel:

It is our understanding that your client, Ms. Reyes, was implanted with a TVT-O device and a Prolift +M device. As set forth in the attached expert designation, you have designated Dr. Blaivas as a general causation expert, but it's unclear whether you intended to designate him as an expert only for the TVT-O device, as Dr. Blaivas has not submitted a Prolift +M general report. Can you please confirm whether you intend to elicit testimony from Dr. Blaivas concerning the Prolift +M device? Thanks very much.

David L. Johnson

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

| | |
|---|---|
| IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION | Master File No. 2:12-MD-02327 MDL No. 2327 |
| THIS DOCUMENT RELATES TO: <i>Monnica Reyes et al. v. Ethicon, Inc., et al.</i> Case No. 2:12-cv-06141 | JOSEPH R. GOODWIN U.S. DISTRICT JUDGE |

**PLAINTIFFS' DESIGNATION AND
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 243, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

RETAINED EXPERT WITNESSES

- 1) Dr. Michael Thomas Margolis (Urogynecologist) (adoption of previously served rpt.)
Bay Area Pelvic Surgery
1820 Ogden Dr.
Burlingame, California 94010
- 2) Dr. Jerry Blaivas (Urogynecologist) (adoption of previously served report)
445 East 77th Street
New York, NY 10075
- 3) Dr. Howard Jordi (Materials) (adoption of previously served report)
Jordi Labs
200 Gilbert Street
Mansfield, MA 02048
- 4) Dr. Vladimir Iakovlev, M.D. (Pathologist) (adoption of previously served report)
St. Michael's Hospital, Division of Pathology
30 Bond Street, Cardinal Carter, Room 2-093

Toronto, ON, M5B1W8
CANADA

GENERAL RETAINED REGULATORY EXPERTS

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling, Plaintiffs reserve the right to designate the following General Regulatory Experts:

- 5) Dr. Peggy Pence (Regulatory) (adoption of previously served reports)
Symbion Research International, Inc.
3537 Old Conejo Road, Suite 115
Newbury Park, CA 91320

NON-RETAINED EXPERT WITNESSES

| NAME | ADDRESS | SPECIALITY |
|--------------------|--|---|
| Dr. Bobby Brown | 7540 Cipriano Court, Suite C Fairhope, AL 36532 | Gynecologist |
| Dr. Robert Varner | 2000 6 th Avenue S, #5 Birmingham, AL 35233 | Gynecologist |
| Dr. Jason Williams | 1680 W. 2 nd Street Gulf Shores, AL 36542 | Vascular & Interventional Radiologist |
| Dr. Alex Childs | 2006 Brookwood Medical Center Drive, Suite #402 Homewood, AL 35209 | Gynecologist |

A General Designation and Disclosure has been or is being served by and on behalf of the wave 4 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation

and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

This 22nd day of May, 2017.

Respectfully submitted,

/s/ Douglas R. Plymale

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